

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ALUMINUM BAHRAIN B.S.C.)
)
Plaintiff,)
)
v.)
)
ALCOA, INC., ALCOA WORLD ALUMINA)
LLC, WILLIAM RICE and VICTOR)
DAHDALEH)
Defendants.)

Civil Action No. 8-299

CASE MANAGEMENT ORDER OF COURT

AND NOW, this 26th day of July, 2012, the following case management schedule shall be adhered to by the parties:

1. The Parties will meet and confer with respect to electronic discovery by August 31, 2012.
2. The defendants will answer the First Amended Complaint by September 7, 2012.
3. The Parties will serve their initial disclosures by September 7, 2012.
4. Fact discovery shall commence on September 10, 2012. The Parties shall complete fact discovery by September 30, 2013. All interrogatories, depositions, requests for admissions and requests for production shall be served within sufficient time to allow responses to be completed prior to the close of discovery.
5. All expert discovery shall be completed by December 31, 2013.
6. Procedures Following Inadvertent Disclosure ("Clawback"): Pursuant to Local Rule LCvR 16.1(D), and to aid in the implementation of Fed. R. Evid. 502, the following is ordered in the event of an inadvertent disclosure of any privileged or trial preparation/attorney work product material:
 - a) The producing party shall promptly notify all receiving parties of the inadvertent production of any privileged or trial preparation material. Any receiving party who has reasonable cause to believe that it has received privileged or trial preparation material shall promptly notify the producing party.
 - b) Upon receiving notice of inadvertent production, any receiving party shall immediately retrieve all copies of the inadvertently disclosed material and sequester such material pending a resolution of the producing party's claim

either by the Court or by agreement of the parties.

c) If the parties cannot agree as to the claim of privilege, the producing party shall move the Court for a resolution within 30 days of the notice set forth in subparagraph (a). Nothing herein shall be construed to prevent a receiving party from moving the court for a resolution, but such motion must be made within the 30-day period.

7. Dispositive motions shall be filed within 30 days of the post-discovery / settlement conference. Responses shall be due within 30 days of service of the dispositive motion. Replies are due within 15 days of service of the Response. Page limitations for such briefs are set forth in this Court's Chambers' Rules.
8. Any Daubert motions to challenge the qualifications of a proposed expert witness and / or the substance of such expert's testimony shall be filed within 30 days of the post-discovery / settlement conference. Responses shall be due within 30 days of service of the Daubert motion. If a motion for summary judgment has been filed, however, the Daubert motion shall be filed within 30 days of the issuance of this Court's Opinion and Order disposing of the motion for summary judgment, with Responses due 30 days after service of the Daubert motion.
9. The post-discovery/settlement conference will be conducted on January 7, 2013 at 1:00 PM in Courtroom 3B.
10. Position Letters:

At least three (3) business days prior to all conferences (case management, settlement, or pre-trial), counsel for every party shall submit a position letter to this Court. The position letter shall set forth the following: (a) A brief recitation of the facts; (b) A discussion of your party's strengths and weaknesses; and (3) Your party's settlement posture. To ensure candor, the position letters are not to be filed nor shared with opposing counsel, but rather, are to be faxed directly to this Court's Chambers at (412)208-7357. All position letters will be kept confidential.

BY THE COURT:



Donetta W. Ambrose,
U.S. Senior District Judge